



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

---

KCB  
F. #2018R02184

*271 Cadman Plaza East  
Brooklyn, New York 11201*

October 23, 2020

**By Hand Delivery and ECF**

Benjamin Silverman  
Law Office of Benjamin Silverman  
224 W. 30th St., Suite 302  
New York, NY 10001  
212-203-8074  
Email: Benjamin@bsilvermanlaw.com

Re:    United States v. Lucio Celli  
          Criminal Docket No. 19-127 (PAE)

Dear Mr. Silverman:

Enclosed please find the government's supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. Specifically, the government previously produced discovery in this case on April 1, 2019; April 23, 2019; May 15, 2019; December 16, 2019; and by email on October 5, 2020. See ECF Dkt. Nos. 27, 35, 37, 52. The contents of those productions are being reproduced to you, and consist of:

- A video-recorded statement made by the defendant following his arrest, as well as a waiver of rights form signed by the defendant. (LC000001–02.)
- Partially-redacted records prepared by the United States Marshals Service ("USMS"), portions of which reflect the defendant's statements. (LC000003–07.)
- Partially-redacted records pertaining to the defendant's criminal history. (LC000008–30.)
- USMS booking paperwork. (LC000031–38.)
- Records provided by the Metropolitan Detention Center. (LC000039–40; LC000199–LC000798.)
- Copies of emails sent by the defendant, designated as "sensitive discovery material" pursuant to the Protective Order entered in this case on April 22, 2019 ("Protective Order"). (LC000041–LC000198.)

- Copies of judicially-authorized search warrants and an affidavit sworn in support of the search warrants, designated as “sensitive discovery material” pursuant to the Protective Order. (LC000799-LC000844.)

In addition, the government hereby furnishes the below-listed supplemental discovery:

- Materials seized in response to the above-identified search warrants, designated as “sensitive discovery material” pursuant to the Protective Order, in both load file and Eclipse Publish formats. (LC000847-LC034469.)
- A full copy of materials received in response to the above-identified search warrants, designated as “sensitive discovery material” pursuant to the Protective Order. (LC000845-LC000846.)
- Partially-redacted records pertaining to the defendant’s criminal history obtained from Yonkers Criminal Court and Westchester County, portions of which contain statements made by the defendant. (LC034470-LC034519.)
- Partially-redacted records pertaining to the defendant’s criminal history. (LC034520-LC034533)
- Partially-redacted records prepared by the USMS, designated as “sensitive discovery material” pursuant to the Protective Order. (LC034534-LC034549.)
- Copies of publicly-available docket reports in Celli v. Cole, et al., 15-CV-3679, and Combier v. Portelos, et al., 17-CV-2239. (LC064550-LC034574.)

You may examine the physical evidence discoverable under Rule 16, including original documents, by calling me to arrange a mutually convenient time. The government renews its request for reciprocal discovery from the defendant. If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

SETH D. DUCHARME  
Acting United States Attorney

By: /s/ Kayla Bensing  
Kayla Bensing  
Assistant U.S. Attorney  
(718) 254-6279

Enclosures

cc: Clerk of the Court (PAE) (by ECF) (without enclosures)